DOCKET FILE COPY ORIGINAL

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Billed Party Preference for InterLATA 0+ Calls	)	CC Docket No. 92-77
	)	

COMMENTS OF SBC COMPANIES

Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell (collectively referred to as the "SBC Companies") file these Comments in support of certain Petitions for Clarification/Reconsideration[1] filed in response to the Commission's Second Report and Order in the above-captioned proceeding.[2] Specifically, the SBC Companies support certain asserations made in the Petitions filed by Ameritech, Bell Atlantic, BellSouth Telecommunications, Inc., AT&T and US West, Inc. The Second Order should be clarified to pertain only to interstate/interLATA 0+ CALLS. The SBC Companies also agree the Commission should clarify the Second Order to require operator service providers ("OSPs") to disclose upon request only that rate information which has been provided directly to them. Finally, the obligation to disclose rate information should

[1] These Comments support positions taken by the respective parties in the Ameritech Petition for Clarification or Reconsideration ("Ameritech Petition"), the Petition for Clarification or Waiver or, in the Alternative, for Clarification and Reconsideration of US West, Inc. ("US West Petition"), the Bell Atlantic Petition for Clarification ("Bell Atlantic Petition"), the AT&T Petition for Clarification and/or Reconsideration ("AT&T Petition"), and the BellSouth Telecommunications, Inc. Petition for Clarification ("BellSouth Petition").

[2] In the Matter of Billed Party Preference for InterLATA 0+ Calls, CC Docket No. 92-77, Second Report and Order and Order on Reconsideration, FCC 98-9, released on January 29, 1998. ("Second Order")

appropriately limited to the party which is responsible payment of the call's charges.

I. THE COMMISSION SHOULD CLARIFY THAT THE SECOND ORDER, CONSISTENT WITH THE UNDERLYING RECORD, PERTAINS ONLY TO 0+ INTERSTATE/INTERLATA CALLS.

In its Second Order, the Commission amended Part 64, Subpart G, Section 64.703 of Title 47 of the Code of Federal Regulations to state that rate information must be disclosed upon request to "the consumer" before connecting "any interstate, interexchange 0+ call." Subsequently, on February 12, 1998, the Commission issued an Erratum changing "0+" to "non-access code operator service." As the referenced Petitioners correctly argue[3], the record in this proceeding supports only directives regarding interLATA 0+ calls, not "interstate, interexchange" calls. Moreover, apparently only the Commission can decipher the meaning of its Erratum substitution. While the purpose of an Erratum is generally to correct a typographical error or an obvious omission, this modification might be read as substantially altering the scope of this docket .

The focus of this matter since its inception has been interLATA 0+ calls. Predecessor proceedings, as well as the passage of the Telephone Operator Consumer Services Improvement Act ("TOCSIA"), sought to the stem abuses in the interLATA arena in relation to unreasonably high rates and anticompetitive practices. This proceeding simply is a natural extention of these attempts to protect the consumer. At no time in its successive Notices of Proposed Rulemaking , did the Commission expressly propose to expand the scope of this proceeding to intraLATA calls. If it was the intent of

[3] Ameritech Petition, pp. 13-20; Bell Atlantic Petition, pp. 1-2; U S West Petition, pp. 5-9; BellSouth Petition, p. 3.

the Commission to apply its proposed regulations to interstate/intraLATA calls, the parties were not adequately apprised of this intent, as evidenced by the Comments and Reply Comments filed. Rather, the parties assumed that, consistent with the caption of the proceeding, only interLATA calls were the subject of the Commission's analysis.

As discussed in greater detail by certain of the Petitioners,[4] an alternate reading of the Second Order as applying to interstate/intraLATA calls would impose a significant expense upon local exchange carriers ("LECs") with no opportunity for cost recovery. As with US West, BellSouth and Ameritech, within the SBC Companies there are only very limited instances in which they provide interstate/ intraLATA operator services. However, because the SBC Companies are not capable of applying a unique treatment to 0+ calls originating from these limited aggregator locations, they would effectively be required under this interpretation to implement rate disclosure procedures for all 0+ calls, regardless of jurisdiction. Thus, the Second Order would far exceed its reasonable parameters by imposing an expensive burden upon LECs without due process.

Similarly, the SBC Companies support the position of Bell Atlantic and BellSouth[5] that only 0+ calls are encompassed by the Commission's dictates. The substitution of the Erratum language confuses, rather than clarifies, this point. While the Second Order itself is clear that its requirements pertain to 0+ calls, the new provision which deletes the reference to "0+" clouds what was previously clear.

---

[4] BellSouth Petition, p.3; Ameritech Petition, p. 17; U S West Petition, pp. 7-9

[5] BellAtlantic Petition, pp. 2-3; BellSouth Petition, p 2.

For these reasons, the SBC Companies join the referenced Petitioners in urging the Commission to clarify its Second Order, and its resulting modifications to Section 64.703, to pertain only to 0+ interstate/interLATA calls.

II. THE COMMISSION SHOULD CLARIFY THAT THE RATE DISCLOSURE REQUIREMENTS APPLY ONLY TO CHARGES WHICH ARE BILLED BY THE OPERATOR SERVICES PROVIDER AND/OR RATE INFORMATION AVAILABLE TO THE OPERATOR SERVICES PROVIDER.

As certain of the Petitioners[6] note, a literal reading of the rate disclosure requirements would require an OSP to disclose rate information as to all separate property fees imposed by call aggregators. This requirement is infeasible. Unless an OSP is billing these charges on behalf of the aggregator, it has no way of knowing what separate fees are being imposed. Moreover, it is logistically impossible to expect the OSP to gain this information through any other means. There are no restrictions on the frequency with which hotels and other aggregators may change these rates. To track and update rates provided voluntarily by aggregators is clearly untenable.

Moreover, the Commission should now recognize that the LECs often are providing wholesale operator services to other competing local service providers.[7] In this role, the LEC must have access to the various rates charged by competing providers in

---

[6] Bell Atlantic Petition, p. 3; U S West Petition, pp. 10-12; Ameritech Petition, pp. 20-23, AT&T Petition, p. 3.

[7] All LECs have the obligation to provide non-discriminatory access to operator services under Sec. 251(b)(3). [47 U.S.C. 251]. SBC Companies may be providing operator services on behalf of competing local exchange providers under interconnection agreements or resale arrangements. In these situations, the competing providers are responsible for setting rates and billing their end-users. Unless the SBC Companies' operator has access to information on the rates charged by competing providers, the operator will not be able to disclose these rates to a caller.

order to disclose rate information to the end-user. The Commission should clarify that all such carriers have an obligation to provide rate information to their OSPs to enable the OSPs to meet the disclosure obligations imposed by this order. If an OSP is denied information as to the rates charged by other carriers, it cannot be held liable for noncompliance.

For these reasons, the SBC Companies strongly endorse the positions of other Petitioners that the Commission should not require OSPs to provide rate information to which they lack access.

III. THE COMMISSION SHOULD SPECIFY THAT THE PARTY RESPONSIBLE FOR THE PAYMENT OF 0+ CHARGES SHOULD BE THE RECIPIENT OF RATE DISCLOSURE INFORMATION.

As modified, Section 64.703 would require that rate disclosure information be made available to the "consumer". The SBC Companies agree with AT&T [8] that, in the case of 0+ collect calls and calls billed to a third number, it is unclear whether the calling party or the called party should be entitled to rate disclosure information. Since the primary purpose of the disclosure is to notify the party responsible for payment as to the amount of the rate, so that he can make a considered decision as to whether to incur the charge, it is reasonable to provide this information to the billed party. For this reason, the SBC Companies support AT&T's position in relation to 0+ collect calls and calls billed to a third number.

IV. CONCUSION

The SBC Companies believe that the issues raised by the referenced Petitioners

[8] AT&T Petition, pp. 2-3.

illustrate the confusion which exists in the industry as to the interpretation and application of the Second Order. The clarification sought by these parties is well-founded both in law and in fact. On this basis, the SBC Companies support these Petitioners by seeking the Commission's clarification that: (1) the Second Order pertains only to interstate/interLATA 0+ calls; (2) an OSP only is required to disclose those rates of which it has knowledge and ; (3) an OSP only is required to provide rate disclosure information to the billed party.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY
PACIFIC BELL
NEVADA BELL

By: Hope Thurrott

Robert M. Lynch
Durward D. Dupre
Hope Thurrott
One Bell Plaza, Room 3023
Dallas, Texas 75202
214-464-3620

Attorneys for Southwestern Bell Telephone Company, Pacific Bell and Nevada Bell

May 6, 1998

CERTIFICATE OF SERVICE

I, Kathy A. Moody, hereby certify that "Comments of SBC Companies" in CC Docket No. 92-77 have been served on May 6, 1998, to the Parties of Record.

Kathy A. Moody

May 6, 1998

WILLIAM E WEISMAN
WEISMAN ENTERPRISES INC
2626 W LAKE STREET
MINNEAPOLIS MN 55416-4405

HENRY WALKER
TENNESSEE PUBLIC SERVICE
COMMISSION
460 JAMES ROBERTSON PARKWAY
NASHVILLE TN 37219

JO ANN GODDARD
DIRECTORY-FED REGULATORY
PACIFIC BELL
NEVADA BELL
1275 PENNSYLVANIA AVE NW
SUITE 400
WASHINGTON DC 20004

TRUDI RENWICK PHD
ECONOMIC POLICY ANALYST
PUBLIC UTILITY LAW PROJECT
OF NEW YORK INC
39 COLUMBIA STREET
ALBANY NEW YORK 12207-2717

HELEN A SHOCKEY
BELLSOUTH CORPORATION
4300 SOUTHERN BELL CENTER
675 WEST PEACHTREE STREET NE
ATLANTA GEORGIA 30375

ANNE U MACCLINTOCK
VP-REGULATORY AFFAIRS & PUBLIC POLICY
SOUTHERN NEW ENGLAND TELEPHONE
COMPANY
227 CHURCH STREET
NEW HAVEN CT 06506

LEON M KESTENBAUM
H RICHARD JUHNKE
US SPRINT COMMUNICATIONS COMPANY
1850 M STREET NW
SUITE 1110
WASHINGTON DC 20036

JOHN T LENAHAN
FRANK M PANEK
LARRY A PECK
AMERITECH OPERATING COMPANIES
2000 WEST AMERITECH CENTER DR
ROOM 4H86
HOFFMAN ESTATES IL 60196-1025

DEBRA W SCHIRO
FLORIDA PUBLIC SERVICE COMMISSION
1010 EAST GAINES STREET
TALLAHASSEE FL 32399-0861

GREGORY CASEY
INTERNATIONAL TELECHARGE INC
6707 DEMOCRACY BLVD
BETHESDA MD 20817

PAUL RODGERS
NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS
1102 ICC BUILDING
PO BOX 684
WASHINGTON DC 20044

W DEWEY CLOWER
HOWARD N MENAKER
NATIONAL ASSOCIATION OF TRUCK STOP OPERATORS
1199 NORTH FAIRFAX STREET
SUITE 801
ALEXANDRIA VA 22314

ANDREW D LIPMAN
RUSSELL M BLAU
ZERO PLUS DIALING INC
SWIDLER & BERLIN CHARTERED
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007

RICHARD E WILEY
DANNY E ADAMS
JANE A FISHER
OPERATOR SERVICE PROVIDERS OF AMERICA
WILEY REIN & FIELDING
1776 K STREET NW
WASHINGTON DC 20006

JOSEPHINE S TRUBEK
GREGG C SAYRE
ROCHESTER TELEPHONE CORPORATION
180 SOUTH CLINTON AVENUE
ROCHESTER NY 14646-0700

DAVID WAGENHAUSER
TELECOMMUNICATIONS RESEARCH AND ACTION CENTER (TRAC)
PO BOX 12038
WASHINGTON DC 20005

RANDALL S COLEMAN
LAWRENCE E SARJEANT
U S WEST
1020 19TH STREET NW
SUITE 700
WASHINGTON DC 20036

LINDA KENT
ASSOCIATE GENERAL COUNSEL
USTA
1401 H STREET NW STE 600
WASHINGTON DC 20005-2136

EDWARD R WHOLL
WILLIAM J BALCERSKI
NYNEX
120 BLOOMINGDALE ROAD
WHITE PLAINS NY 10605

BRYAN G MOORHOUSE
PUBLIC SERVICE COMMISSION OF MARYLAND
6 SAINT PAUL STREET
BALTIMORE MD 21202-1631

H RICHARD JUNKE
JAY C KEITHLEY
UNITED TELECOMMUNICATIONS INC
1850 M STREET NW
11TH FLOOR
WASHINGTON DC 20036

FRANCINE J BERRY
MARK C ROSENBLUM
ROBERT J MCKEE
AT&T
295 NORTH MAPLE AVENUE
ROOM 3244J1
BASKING RIDGE NJ 07920

GARY L PHILIPS
COUNSEL FOR AMERITECH
1401 H STREET N W SUITE 1020
WASHINGTON D C 20005

ROY L MORRIS
ALLNET COMMUNICATIONS SERVICES INC
1990 M STREET NW
SUITE 500
WASHINGTON DC 20036

MARY J SISAK
DONALD L ELARDO
MCI TELECOMMUNICATIONS CORP
1801 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20006

ROBERT M PEAK
UNITED ARTISTS PAYPHONE CORP
REBOUL MACMURRAY HEWITT MAYNARD & KRISTOL
1111 19TH STREET NW
SUITE 406
WASHINGTON DC 20036

JOHN M GOODMAN
BELL ATLANTIC
1320 N COURT HOUSE ROAD 8TH FL
ARLINGTON VA 22201

(2 COPIES)
POLICY & PROGRAM PLANNING DIVISION
COMMON CARRIER BUREAU
1919 M STREET NW
ROOM 544
WASHINGTON DC 20554

RANDOLPH J MAY
DAVID A GROSS
ELIZABETH C BUCKINGHAM
SUTHERLAND ASBILL & BRENNAN
CAPITAL NETWORK SYSTEM INC
1275 PENNSYLVANIA AVENUE NW
WASHINGTON DC 20004-2404

ANDREW D LIPMAN
ROBERT G BERGER
SWIDLER & BERLIN CHTD
COASTAL AUTOMATED COMMUNICATIONS CORPORATION
EASTERN TELECOM CORPORATION
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

DOUGLAS F BRENT
LDDSMETROMEDIA COMMUNICATIONS
9300 SHELBYVILLE ROAD SUITE 700
LOUISVILLE KY 40222

MARTA GREYTOK
KARL RABAGO
ROBERT W GEE
PUBLIC UTILITY COMMISSION OF TEXAS
7800 SHOAL CREEK BLVD
SUITE 400N
AUSTIN TX 78757

SUSAN M SHAHAMAN
CENTRAL ATLANTIC PAYPHONE ASSOC
21 N 4TH STREET
HARRISBURG PA 17101

DANNY E ADAMS
STEVEN A AUGUSTINO
KELLY DRYE & WARREN
COUNSEL FOR
COMPETITIVE TELECOMMUNICATIONS ASSOCIATION
1200 19TH ST NW STE 500
WASHINGTON DC 20036

GAIL L POLIVY
GTE SERVICE CORPORATION
1850 M STREET NW
SUITE 1200
WASHINGTON DC 20036

ALBERT H KRAMER
ROBERT F ALDRICH
AMERICAN PUBLIC COMMUNICATIONS COUNCIL
KECK MAHIN & CATE
1201 NEW YORK AVENUE NW
PENTHOUSE SUITE
WASHINGTON DC 20005-3919

ANDREW D LIPMAN
JEAN L KIDDOO
ANN P MORTON
SWIDLER & BERLIN
ATTORNEYS FOR ROBERT CEFAIL & ASSOC
AMERICAN INMATE COMMUNICATIONS INC
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

DAVID COSSEN
L MARIE GUILLORY
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION
2626 PENNSYLVANIA AVE NW
WASHINGTON DC 20037

LINDA T MUIR
CONTEL CORPORATION
245 PERIMETER CENTER PARKWAY
PO BOX 105194
ATLANTA GA 30348

DEBORAH BARRETT
ONE CALL COMMUNICATIONS INC
D/B/A OPTICOM
801 CONGRESSIONAL BLVD
SUITE 100
CARMEL IN 46032

JAMES P TUTHILL
NANCY C WOOLF
THERESA L CABRAL
PACIFIC BELL
NEVADA BELL
140 NEW MONTGOMERY STREET ROOM 1523
SAN FRANCISCO CALIFORNIA 94105

W AUDIE LONG ESQ
KENNETH F MELLEY JR
US LONG DISTANCE INC
9311 SAN PEDRO SUITE 300
SAN ANTONIO TEXAS 78216

ANDREW D LIPMAN
JEAN L KIDDOO
ANN P MORTON
ATTORNEYS FOR
LDDS COMMUNICATIONS INC
SWIDLER & BERLIN CHARTERED
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

ZERO PLUS DIALING INC
ALAN W SALTZMAN
SENIOR VICE PRESIDENT
9311 SAN PEDRO SUITE 300
SAN ANTONIO TX 78216

COMTEL COMPUTER CORPORATION
JOHN A LIGON
128 MOUNT HEBRON AVENUE
PO BOX 880
UPPER MONTCLAIR NJ 07043

PHONETEL TECHNOLOGIES INC
MITCHELL F BRECHER
DOW LOHNES & ALBERTSON
1255 TWENTY-THIRD STREET NW
WASHINGTON DC 20554

VALUE-ADDED COMMUNICATIONS INC
GLENN B MANISHIN
ITS ATTORNEY
BLUMENFELD & COHEN
1615 M STREET NW SUITE 700
WASHINGTON DC 20036

CLEARTEL COMMUNICATIONS INC AND
COM SYSTEMS INC
JEAN L KIDDOO
ANN P MORTON
SWIDLER & BERLIN CHARTERED
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

QUEST COMMUNICATIONS CORPORATION
RICK L ANTHONY
EXECUTIVE VICE PRESIDENT
8829 BOND STREET
SHAWNEE MISSION KANSAS 66214-1707

SDN USERS ASSOCIATION INC
LARRY MORELAND
PRESIDENT
C/O CATERPILLAR INC
600 W WASHINGTON STR AD341
EAST PEORIA ILLINOIS 61630

KEITH J ROLAND
ROLAND FOGEL KOBLEZ & CARR
ONE COLUMBIA PLACE
ALBANY NY 12207

HELEN M HALL
KECK MAHIN & CATE
INMATE CALLING SERVICE TASK FORCE
1201 NEW YORK AVENUE NW
WASHINGTON DC 20005-3919

STEPHEN G KRASKIN
KRASKIN & ASSOCIATES
ATTORNEY FOR US INTELCO NETWORKS INC
2120 L STREET NW
SUITE 520
WASHINGTON DC 20037

STEVEN J JOGAN
LINKUSA
230 2ND STREET SE
SUITE 400
CEDAR RAPIDS IA 52401

JAMES D HEFLINGER
LITEL TELECOMMUNICATIONS CORP
D/B/A LCA INTERNATIONAL
4650 LAKEHURST COURT
DUBLIN OH 43017

BERN E CASE AAE
LUBBOCK INTERNATIONAL AIRPORT
ROUTE 3 BOX 389
LUBBOCK TX 79401

DEBRA L LAGAPA
MARY K O'CONNELL
MORRISON & FOERSTER
MASTERCARD INTERNATIONAL INCORP
2000 PENNSYLVANIA AVE NW
SUITE 5500
WASHINGTON DC 20006

JERRY L MCMICHAEL
MEMPHIS INTERNATIONAL AIRPORT
PO BOX 30168
MEMPHIS TN 38130-0168

DOUBLAS E NEEL
MESSAGEPHONE INC
5910 N CENTRAL EXPRESSWAY
SUITE 1575
DALLAS TX 75206

RONALD G CHOURA
MICHIGAN PUBLIC SERVICE COMMISSION
PO BOX 30221
LANSING MI 48909-7721

COLLEEN M DALE
MISSOURI PUBLIC SERVICE COMMISSION
PO BOX 360
JEFFERSON CITY MO 65102

PATRICIA A SIMMONS
MONTANA STATE UNIVERSITY
OFFICE OF SYSTEMS & COMPUTING
SERVICES
RENNE LIBRARY BASEMENT
BOZEMAN MT 59717-0324

ALAN J THIEMANN
TAYLOR THIEMANN & AITKIN
NATIONAL ASSOCIATION
OF CONVENIENCE STORES
908 KING STREET
SUITE 300
ALEXANDRIA VA 22314

NIXON HARGRAVE DEVANS & DOYLE
ONE THOMAS CIRCLE
SUITE 800
WASHINGTON DC 20005

KENNETH R SCOTT
NORFOLK AIRPORT AUTHORITY
NORFOLK INTERNATIONAL AIRPORT
NORFOLK VA 23518-5897

ALBERT H KRAMER
ROBERT F ALDRICH
KECK MAHIN & CATE
NORTH AMERICAN TELECOMMUNICATIONS
ASSOCIATION
1201 NEW YORK AVENUE NW
PENTHOUSE SUITE
WASHINGTON DC 20005

LISA M ZAINA
OPASTCO
21 DUPONT CIRCLE NW
SUITE 700
WASHINGTON DC 20036

PAUL C BESOZZI
BESOZZI GAVIN & CRAVEN
POLAR COMMUNICATIONS CORPORATION
1901 L STREET NW
SUITE 200
WASHINGTON DC 20036

JOSEPHINE S TRUBEK
ROCHESTER TEL CENTER
RCI LONG DISTANCE INC
180 SOUTH CLINTON AVENUE
ROCHESTER NY 14646-0700

ELLEN M AVERETT
PENNSYLVANIA PUBLIC
UTILITY COMMISSION
PO BOX 3265
G-28 NORTH OFFICE BUILDING
HARRISBURG PA 17105-3265

GARY JOSEPH
SHARENET COMMUNICATIONS
PO BOX 14349
PHOENIX AZ 85063

H RICHARD JUHNKE
SPRINT CORPORATION
1850 M STREET NW
11TH FLOOR
WASHINGTON DC 20036

JOHN W PRIEST
THE TELTRONICS GROUP
2150 WHITFIELD INDUSTRIAL WAY
SARASOTA FL 34243-4046

O LANE MCCOTTER
UTAH DEPARTMENT OF CORRECTIONS
6100 SOUTH 300 EAST
MURRAY UT 84107

PAMELA J BRANDON
WISCONSIN DEPT OF CORRECTIONS
POBOX 7925
MADISON WI 53707

JOHN B MOW
4801 SPRING VALLEY
SUITE 105A
DALLAS TX 75244

RANDOLPH J MAY
ELIZABETH C BUCKINGHAM
SUTHERLAND ASBILL & BRENNAN
ADVANCED TECHNOLOGIES CELLULAR
TELECOMMUNICATIONS INC
1275 PENNSYLVANIA AVE NW
WASHINGTON DC 20004-2404

STEVE SCHUDE
ADVANCED PAYPHONE SYSTEMS INC
535 W IRON AVENUE
SUITE 122
MESA AZ 85210

BARBARA GREENE
DIRECTOR REGULATORY AFFAIRS
ALTERNATE COMMUNICATIONS TECHNOLOGY
8900 KEYSTONE CROSSING SUITE 1090
POST OFFICE BOX 40189
INDIANAPOLIS IN 46240-0189

BRIAN J KINSELLA
THOMAS F YOUNGBLOOD
AMERICAN HOTEL & MOTEL ASSOCIATION
1201 NEW YORK AVENUE NW
WASHINGTON DC 20005-3931

AMERICAN JAIL ASSOCIATION
1000 DAY ROAD
SUITE 100
HAGERSTOWN MD 21740

JOHN F DODD
BRAD I PEARSON
SMITH GILL FISHER & BUTTS
AMERICAN TELEMANAGEMENT INC
ONE KANSAS CITY PLACE
1200 MAIN STREET 35TH FLOOR
KANSAS CITY MO 64105-2152

GEORGE CHRISTENBERRY JR
DEPARTMENT OF ADMINISTRATIVE SERVICES
TELECOMMUNICATIONS DIVISION
200 PIEDMONT AVENUE
SUITE 1402 WEST TOWER
ATLANTA GA 30334-5540

JAMES B DRONSFIELD
DIRECTOR TELECOMMUNICATIONS
DUKE UNIVERSITY
DURHAM NC 27706

WALTER STEIMEL JR
FISH & RICHARDSON
601 THIRTEENTH STREET NW
WASHINGTON DC 20005

JIM ALLEN
GASTON MEMORIAL HOSPITAL
2525 COURT DRIVE
PO BOX 1747
GASTONIA NC 28053-1747

RICHARD L GOLDBERG
GRAHAM & JAMES
ONE MARITIME PLAZA
THIRD FLOOR
SAN FRANCISCO CA 94111

MAURICE D MURPHY
HARVARD UNIVERSITY
OFFICE FOR INFORMATION TECHNOLOGY
10 WARE STREET
CAMBRIDGE MASS 02138

JEAN L KIDDOO
ANN P MORTON
SWIDLER & BERLIN CHTD
ATTORNEYS FOR OPUS CORRECTIONAL
INC D/B/A LOCTEL
3000 K STREET NW
SUITE 300
WASHINGTON DC 20007

TARIFF DIVISION
COMMON CARRIER BUREAU
1919 M STREET NW ROOM 518
WASHINGTON DC 20554

ITS INC
1919 M STREET NW
ROOM 246
WASHINGTON DC 20036

ARIZONA DEPARTMENT OF CORRECTIONS
1601 WEST JEFFERSON STREET
PHOENIX AZ 85007-3003

COMCENTRAL CORP
2150 WHITFIELD INDUSTRIAL WAY
SARASOTA FL 34243-4046

JAMES F MEEHAN
CONNECTICUT CONSUMER COUNSEL
136 MAIN STREET SUITE 501
NEW BRITIAN CT 06051

EDWARD C ADDISON DIRECTOR
VIRGINIA STATE CORPORATION
COMMISSION STAFF
PO BOX 1197
RICHMOND VIRGINIA 23209

BRENT A KITCHEN
AIRPORTS DIRECTOR
TULSA INTERNATIONAL AIRPORT
PO BOX 581838
TULSA OKLAHOMA 74158

RL JONES JR
RIVERSIDE AIRPORT
PO BOX 340
JENKS OKLAHOMA 74037

LARRY A FIELDS DIRECTOR
OKLAHOMA DEPT OF CORRECTIONS
3400 N MARTIN LUTHER KING AVENUE
OKLAHOMA CITY OKLAHOMA 73136

KARL D MYERS
DIRECTOR BUSINESS & PROPERTY
MANAGEMENT
SEATTLE-TACOMA
INTERNATIONAL AIRPORT
PO BOX 68727
SEATTLE WASHINGTON 98168

PATRICIA R TAPPAN COMMISSIONER
DEPARTMENT OF CORRECTION
ONONDAGA COUNTY
PO BOX 143
JAMESVILLE NEW YORK 13078

FRED A SPRUILL SHERIFF
CHOWAN COUNTY SHERIFF'S OFFICE
PO BOX 78
EDENTON NORTH CAROLINA 27932

EDWARD J CAMP SHERIFF
ADAMS COUNTY SHERIFF'S DEPT
1901 EAST BRIDGE STREET
BRIGHTON CO 80601-1937

ANTHONY W PELLICANE
DIRECTOR OF CORRECTIONS
MONMOUTH COUNTY DEPT OF CORRECTIONS
1 WATERWORKS ROAD
FREEHOLD NEW JERSEY 07728

DANIEL B CALVERT SHERIFF
500 NW 6TH/COURTHOUSE
GRANTS PASS OREGON 97526

DON HASS PRESIDENT
OKLAHOMA SHERIFFS' ASSOCIATION
PO BOX 1094
NORMAN OKLAHOMA 73070

MARGARTE VONHEEDER DIRECTOR
DIVISION OF MANAGEMENT & BUDGET
DEPT OF CORRECTIONS
PO BOX 41100
OLYMPIA WASHINGTON 98504-1100

J MANNING LEE
SENIOR REGULATORY COUNSEL
TELEPORT COMMUNICATIONS GROUP INC
2 TELEPORT DRIVE
STATEN ISLAND NY 10311

DAVID COSSON
ATTORNEY FOR NATIONAL TELEPHONE
COOPERATIVE ASSOCIATION
2626 PENNSYLVANIA AVEN NW
WASHINGTON DC 20037

GLENN B MANISHIN
NEIL S ENDE
BLUMENFELD & COHEN
1615 M STREET NW
SUITE 700
WASHINGTON DC 20036

CINDY Z SCHONHAUT ESQ
MFS COMMUNICATIONS COMPANY INC
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

MURRAY RICHARDSON SHERIFF
BAKER COUNTY
56 N 2ND STREET
MACCLENNY FL 32063

LT EDDY MARKHAM
PO BOX 1240
CARLSBAD NM 88221-1240

CARL POTEETE SHERIFF
AND COLLECTOR OF CONWAY
COUNTY
MORRILTON ARKANSAS 72110

PAUL BRODEUR COMMISSIONER
DEPT OF CORRECTIONS
OFFICE OF THE COMMISSIONER
105 PLEASANT ST MAIN BUILDING
4TH FLOOR
PO BOX 1806
CONCORD NH 03302-1806

LEROY MOODY SHERIFF
SAN PATRICIO COUNTY
PO BOX 1382
SINTON TEXAS 78387-1382

TOM SAWYER
SHERIFF-CORONER
2222 "M" STREET
MERCED CALIFORNIA 95340

CAPT RICK ADKINS
SHASTA COUNTY SHERIFF'S DEPT
MAIN JAIL FACILITY
1655 WEST STREET
REDDING CA 96001

CHARLES W GATES
CITY OF AUSTIN
3600 MANOR ROAD
AUSTIN TX 78723

EUGENE F MULLIN
CHRISTOPHER A HOLT
MULLIN RHYNE EMMONS AND TOPEL PC
1225 CONNECTICUT AVENUE NW
SUITE 300
WASHINGTON DC 20036-2604

CHERYL A TRITT
MORRISON & FOERSTER
2000 PENNSYLVANIA AVENUE NW
SUITE 5500
WASHINGTON DC 20006

STEVEN E SWENSON
ATTORNEY FOR TELTRUST INC
LINDBERGH PLAZA I
221 N CHARLES LINDBERGH DRIVE
SALT LAKE CITY UTAH 84116

BRAD E MUTSCHELKNAUS
ANN M PLAZA
WILEY REIN & FIELDING
1776 K STREET NW
WASHINGTON DC 20006

WILLIAM F SHEPARD
GLOBAL TEL LINK
2609 CAMERON STREET
MOBILE ALABAMA 36607

MICHAEL H DAVIS
VP OPERATIONS/TELECOMMUNICATIONS
HOLIDAY INN CORPORATE HEADQUARTERS
THREE RAVINIA DRIVE SUITE 2000
ATLANTA GA 30346-2149

JOHN W ANDERSON AAE
AIRPORT DIRECTOR
3201 AIRPORT WAY
BOISE IDAHO 83705-5096

LINDA L TRATNIK PRESIDENT
SDN USERS ASSOCIATION INC
PO BOX 4014
BRIDGEWATER NJ 08807

BILL ALESHIRE
COUNTY JUDGE
TRAVIS COUNTY
PO BOX 1748
AUSTIN TEXAS 78767

THOMAS E MAY CONTROLLER
MID CAL AUTO/TRUCK PLAZA
12310 S HIGHWAY 33 & I-5
SANTA NELLA CA 95322

BRYON SWANSON
COFFEE POT CAFE
7120 E 49TH AVENUE
COMMERCE CITY CO 80022

NANCI ADLER
CONSULTANT TO OPERATOR SERVICE
COMPANY
TECHNOLOGIES MANAGEMENT INC
163 E MORSE BLVD
SUITE 300
PO DRAWER 200
WINTER PARK FL 32790-0200

ALBERT H KRAMER
DAVID B JEPPSEN
ATTORNEYS FOR THE INMATE CALLING
SERVICES PROVIDERS TASK FORCE
KECK MAHIN & CATE
1201 NEW YORK AVENUE NW
WASHINGTON DC 20005-3919

DEBRA BERLYN
NASUCA
1133 15TH STREET NW SUITE 575
WASHINGTON DC 20005

VINCENT TOWNEND PRESIDENT
NORTH CAROLINA PAYPHONE ASSOC
9 OAK BRANCH DRIVE
GREENSBORO NC 27407

DANIEL J ROOKS
4250 BLACKLAND DRIVE
MARIETTA GA 30067

CHERYL A TRITT
MORRISON & FOERSTER
COUNSEL FOR CITIZENS
UNITED FOR REHABILITATION
OF ERRANTS
2000 PENNYSLVANIA AVE NW
SUITE 5500
WASHINGTON DC 20006

MARK C ROSEMBLUM
AT&T CORP
295 NORTH MAPLE AVENUE
BASKING RIDGE NJ 07920

AMY S GROSS
ATTORNEY FOR AMERICAN NETOWKR
EXCHANGE INC
101 PARK AVENUE SUITE 2507
NEW YORK NY 10178

SHELDON ELLIOT STEINBACK
VP AND GENERAL COUNSEL
AMERICAN COUNCIL ON EDUCATION
ONE DUPONT CIRCLE NW
WASHINGTON DC 20036

ANNE GROSS
PROGRAM MANAGER PUBLIC POLICY
AND MANAGEMENT PROGRAMS
NATIONAL ASSOCIATION OF COLLEGE
AND UNIVERSITY BUSINESS OFFICERS
ONE DUPONT CIRCLE NW
WASHINGTON DC 20036

ELLYN ELISE CRUTCHER
COUNSEL FOR THE CONSOLIDATED
COMPANIES
121 SOUTH 17TH STREET
MATTOON IL 61938

ANDREW D LIPMAN
JEAN L KIDDOO
ANN P MORTON
ATTORNEYS FOR AIRPORTS ASSOCIATION
COUNCIL INTERNATIONAL - NA
SWIDLER & BERLIN CHTD
3000 K STREET NW SUITE 300
WASHINGTON DC 20007

PATTY HAHN
GENERAL COUNSEL
ACI-NA
1775 K STREET NW
SUITE 500
WASHINGTON DC 20006

KATHLEEN M HAWK DIRECTOR
US DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF PRISONS
WASHINGTON DC 20534

GERALD F WASHBURN
SHERIFF ONEIDA COUNTY
LAW ENFORCEMENT BUILDING
ORISKANY NEW YORK 13424-2271

LARRY P STEWART SHERIFF
SWISHER COUNTY
136 E BROADWAY
TULIA TEXAS 79088

KATHY L SHOBERT
DIRECTOR FEDERAL REGULATORY AFFAIRS
901 15TH STREET NW SUITE 900
WASHINGTON DC 20005

THOMAS ENGEL
DIRECTOR OF AIRPORTS
COUNTY OF SACRAMENTO
5900 AIRPORT BOULEVARD
SACRAMENTO CA 95837

SUSAN M SHANAMAN
ATTORNEY FOR THE CENTRAL ATLANTIC
PAYPHONE ASSOCIATION
21 NORTH 4TH STREET
HARRISBURG PENNSYLVANIA 17101

RICHARD O KLOTZ
DEPARTMENT OF CORRECTIONS
COUNTY OF LEHIGH
38 NORTH 4TH STREET
ALLENTOWN PENNSYLVANIA 18105

DANIEL E HORNBERGER WARDEN
CLARION COUNTY JAIL
5216 AMSLER AVE
SHIPPENVILLE PA 16254-8914

THOMAS A COUGHLIN III COMMISSIONER
DEPT OF CORRECTIONAL SERVICES
THE STATE OFFICE BUILDING CAMPUS
ALBANY NY 12226

JAMES H GOMEZ
DEPARTMENT OF CORRECTIONS
P O BOX 942883
SACRAMENTO CA 94283-0001

VINCENT A GUARINI
WARDEN
LANCASTER COUNTY PRISON
625 E KING STREET
LANCASTER PA 17602

GERALD NORLANFDER
DEPUTY DIRECTOR
PUBLIC UTILITY LAW PROJECT
OF NEW YORK INC
39 COLUMBIA STREET
ALBANY NY 12207-2717

HARRY K SINGLETARY JR
SECRETARY
FLORIDA DEPARTMENT OF
CORRECTIONS
2601 BLAIR STONE ROAD
TALLAHASSEE FLORIDA 32399-2500

MICHAEL W SCOTT CEO
CMS
731 WALKER ROAD
SUITE H-2
GREAT FALLS VA 22066

PERRY R OWEN
BUSINESS OWNER
P O BOX 60474
SACRAMENTO CA 95860

JAMES U TROUP
ARTER & HADDEN
COUNSEL FOR
IOWA NETWORK SERVICES INC
1801 K STREET NW STE 400K
WASHINGTON DC 20006

BRAD E MUTSCHELKNAUS
WILEY REIN & FIELDING
ATTORNEY FOR AMERITEL PAY
PHONES INC
1776 K STREET NW
WASHINGTON DC 20006

GLENN B MANISHIN
BLUMENFELD & COHEN
COUNSEL FOR GATEWAY
TECHNOLOGIES INC
1615 M STREET NW
SUITE 700
WASHINGTON DC 20036

BOB SCHOONMAKER
VICE PRESIDENT
GVNW INC/MANAGEMENT
PO BOX 25969
COLORADO SPRINGS CO 80936

KATHY L SHOBERT
DIRECTOR FEDERAL REGULATORY
AFFAIRS
GENERAL COMMUNICATION INC
901 15TH STREET NW
SUITE 900
WASHINGTON DC 20005

ALANE C WEIXEL
COVINGTON & BURLING
1201 PENNSYLVANIA AVE NW
COUNSEL FOR ANCHORAGE TELEPHONE
UTILITY
WASHINGTON DC 20044-7566

CHARLES M BARCLAY AAE
PRESIDENT AMERICAN ASSOCIATION
OF AIRPORT EXECUTIVES
4212 KING STREET
ALEXANDRIA VA 22302

GEORGE AVOSE JR
DIRECTOR R I DEPT
OF CORRECTIONS
40 HOWARD AVENUE
CRANSTON RI 02920

HOWARD PORTER
DIRECTOR OF COMPUTING SVCS
ADAMS STATE COLLEGE
ALAMOSA CO 81102

MR MARLAN TEVIS
ASST DIRECTOR OF CORRECTIONS
777 E FABYAN PARKWAY
BATAVIA ILLINOISS 60510

MARION COUNTY SHERIFF
JOSEPH MCATEE
40 SOUTH ALABAMA STREET
INDIANAPOLIS INDIANA 46204

GAINES P STURDIVANT CHA
PRESIDENT MMI HOTEL GROUP
1817 CRANE RIDGE DRIVE
JACKSON MISSISSIPPI 39216

KELLIE PHILLIPS
DIRECTORY OF OPERATOR SERVICES
4251 SOUTH HIGUERA
SAN LUIS OBISOP CA 93401

JOHN M BISINGER
SR VICE PRESIDENT
515 NORTH STATE STREET
SUITE 2850
CHICAGO ILLINOIS 60610

BOARD OF SUPERVISORS
COUNTY OF KENOSHA
912 56TH STREET
KENOSHA WISCONSIN 53140

JAMES TUSO
SHERIFF-CORONER
MENDOCINO COUNTY
951 LOW GAP RD
UKIAH CA 95482

THOMAS G FRAME WARDEN
CHESTER COUNTY PRISON
501 S WAWASET RD
WEST CHESTER PA 19382

DAVID R RODRIGUES
DEPUTY WARDEN OF OPERATIONS
COUNTY OF ERIE
DEPT OF CORRECTIONS
139 WEST 5TH STREET
ERIE PENSYLVANIA 16507

TROY W STOVER
ADMINISTRATIVE SUPPORT
JEFFCO AIRPORT
11755 AIRPORT WAY
TERMINAL BUILDING
BROOMFIELD COLORADO 80021

W SCOTT DEAVER
VP-MARKETING RAMADA
FRANCHISE SYSTEMS INC
339 JEFFERSON ROAD
PO BOX 278
PARSIPPANY NY 07054-0278

GAINES P STURDIVANT CHA
MMI HOTEL GROUP
1817 CRANE RIDGE DRIVE
JACKSON MISSISSIPPI 39216